

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEBORAH DONOHO, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Cause No. 4:19-CV-00186-NAB
)	
THE CITY OF PACIFIC, MISSOURI,)	
)	
Defendant.)	

PLAINTIFFS' MOTION FOR APPROVAL OF FLSA SETTLEMENT

COME NOW Plaintiffs Deborah Donoho and Cassidy Hodge¹, by and through undersigned counsel, and for their Motion for Approval of FLSA Settlement, state as follows:

1. Defendant City of Pacific, Missouri ("Defendant") and Plaintiffs (collectively, "the Parties") attended mediation on September 16, 2019.
2. The Parties continued to negotiate and discuss settlement terms in the days following mediation.
3. The Parties reached a settlement on all claims raised by Plaintiffs against Defendant, including, *inter alia*, Plaintiffs' FLSA claims for unpaid overtime raised in their Complaint. (Doc. #1). The Settlement Agreement and Release memorializes the terms of the settlement. *See* Exhibit 1.
4. This request for court approval of FLSA settlement is not opposed by any party to this case.

¹ Both named plaintiffs and all six dispatchers who joined this lawsuit signed the Settlement Agreement and Release, which is attached hereto as Exhibit 1. Donoho, Hodge and opt-in plaintiffs Paige Clark, Ashley Long, Luke Myers, Samantha Sappington, Laura Toombs, and Valerie Woolfe are collectively referred to herein as "Plaintiffs."

5. Plaintiffs adopt and incorporate by reference hereto their Suggestions in Support of Plaintiffs' Motion for Approval of FLSA Settlement, which is filed contemporaneously with this Motion and sets forth in more detail the basis for approval of the FLSA settlement.

WHEREFORE, Plaintiffs respectfully request this Court enter an Order to approve the FLSA settlement agreement (Exhibit 1) as fair, reasonable and appropriate; approve Plaintiffs' FLSA attorneys' fees in the amount of \$29,263.20; enter an Order to dismiss this case with prejudice; and for such other and further relief as this Court deems appropriate.

Respectfully Submitted,

/s/ Kevin Dolley
Kevin J. Dolley, #54132MO
Michael G. Mueth, #58995MO
LAW OFFICES OF KEVIN J. DOLLEY, LLC
2726 S. Brentwood Blvd.
St. Louis, MO 63144
Phone: (314) 645-4100
Facsimile: (314) 736-6216
kevin@dolleylaw.com
michael.mueth@dolleylaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on Defendant's counsel of record via electronic mail and the Court's electronic filing system on October 10, 2019.

/s/ Kevin J. Dolley